

George F. Hand, Esq.  
Nevada Bar No. 8483  
[gband@handsullivan.com](mailto:gband@handsullivan.com)  
Samantha A. Herbeck, Esq.  
Nevada Bar No. 14542  
[sherbeck@handsullivan.com](mailto:sherbeck@handsullivan.com)  
**HAND & SULLIVAN, LLC**  
3442 North Buffalo Drive  
Las Vegas, Nevada 89129  
Telephone: (702) 656-5814  
Facsimile: (702) 656-9820

Attorneys for Plaintiff  
STATE FARM FIRE AND CASUALTY COMPANY as  
Subrogee of THOR JORGENSEN

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

STATE FARM FIRE AND CASUALTY  
COMPANY as Subrogee of THOR  
JORGENSEN,

Plaintiff,

vs.

SPACOM, L.L.C. dba BATCADDY LLC, a  
foreign limited liability company; DOES I - v,  
inclusive; ROE CORPORATIONS I - V,  
inclusive,

Defendants.

CASE NO.: 2:24-cv-01543-CDS-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(SECOND REQUEST)**

Pursuant to LR IA6-1(a), LR IA 6-2, and LR 26-3, Plaintiff STATE FARM FIRE AND CASUALTY COMPANY, as Subrogee of THOR JORGENSEN, by and through its counsel of record George F. Hand, Esq. and Samantha A. Herbeck, Esq., from the law firm of HAND & SULLIVAN, LLC and Defendant SPACOM, LLC., by and through its attorney of record Richard Waltjen, Esq. from the law firm of PYATT SILVESTRI (collectively referred to as the "Parties"), hereby stipulate and agree to extend the Discovery Deadlines in the current Discovery Plan and Scheduling Order in this matter for a period of 60 days.

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**A. DISCOVERY COMPLETED**

1. Plaintiff has made initial disclosures of witnesses and documents;
2. Defendant has made initial disclosures of witnesses and documents;
3. Plaintiff has made supplemental disclosures of witnesses and documents;
4. Defendant has made supplemental disclosure of witnesses and documents;
5. Plaintiff has made their first set of interrogatories to Defendants;
6. Plaintiff has made their first set of requests for production of documents to Defendants;
7. Defendant has made their responses to Plaintiff's first set of interrogatories;
8. Defendant has made their responses to Plaintiff's first set of requests for production of documents;
9. Defendant has made their first set of interrogatories to Plaintiff;
10. Defendant has made their first set of requests for production of documents to Plaintiff;
11. Defendant has made their first of requests for admissions to Plaintiff;
12. Defendant has made their second set of requests for production of documents to Plaintiff;
13. Plaintiff has made their responses to Defendants first set of interrogatories; and
14. Plaintiff has made their responses to Defendants first set of requests for production of documents;

**B. DISCOVERY THAT REMAINS TO BE COMPLETED**

1. Plaintiffs responses to Defendants first set of requests for admissions.
2. Plaintiffs responses to Defendants second set of requests for production of documents.
3. The deposition of Defendant's 30(b)(6) Witness is currently scheduled for March 11, 2025.
4. The deposition of Thor Jorgensen.

- 1           5.     The deposition of Jette Jorgensen.
- 2           6.     The deposition of Plaintiffs 30(b)(6) Witness.
- 3           7.     Additional Depositions, including expert depositions, remain to be
- 4                 completed by both parties
- 5           8.     Additional Written Discovery remains to be completed by both parties.
- 6           9.     Initial and Rebuttal Expert disclosures remain to be completed by both
- 7                 parties.
- 8           10.    Other further appropriate discovery may also be necessary.

9           **C.     REASONS WHY DISCOVERY REMAINING WAS NOT COMPLETED**

10          The parties have been working diligently to complete discovery; however, due to the  
11 scheduling of depositions, other discovery has been delayed. Thus, although the parties have made  
12 every effort to cooperate throughout the process, they nonetheless will be unable to complete  
13 discovery before the current deadlines expire.

14          The proposed extension will provide the parties with the time needed to complete the  
15 remaining discovery necessary for the parties' claims and defenses.

16          This Request is not sought for any improper purpose or other purpose of delay. Rather, it is  
17 sought by the parties for the purpose of conducting all necessary discovery.

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**D. DISCOVERY DEADLINES****Current****Joint Proposed  
Amended**

1.	Close of Discovery	05/16/2025	07/15/2025
2.	Final Dates for Expert Disclosures		
(a)	Initial Disclosures	03/17/2025	05/16/2025
(b)	Rebuttal Disclosures	04/15/2025	06/13/2025
3.	Dispositive Motions	06/13/2025	08/12/2025
4.	Pretrial Order	07/15/2025	11/12/2025

**HAND & SULLIVAN, LLC****PYATT SILVESTRI**

Dated: March 3, 2025

Dated: March 3, 2025

/s/ George F. Hand/s/ Richard Waltjen

George F. Hand, Esq. (#8483)  
 Samantha A. Herbeck, Esq. (#14542)  
 3442 North Buffalo Drive  
 Las Vegas, Nevada 89129  
*Attorneys for Plaintiff*

James P.C. Silvestri, Esq. (#3603)  
 Richard Waltjen, Esq. (#13416)  
 7670 W. Lake Mead Blvd., Suite 250  
 Las Vegas, Nevada 89128  
*Attorneys for Defendant*

**ORDER**

Upon Stipulation of the parties;

IT IS SO ORDERED that the discovery deadlines be extended as follows:

- |     |                                    |            |
|-----|------------------------------------|------------|
| 1.  | Close of Discovery                 | 07/15/2025 |
| 2.  | Final Dates for Expert Disclosures |            |
| (a) | Initial Disclosures                | 05/16/2025 |
| (b) | Rebuttal Disclosures               | 06/13/2025 |
| 3.  | Dispositive Motions                | 08/12/2025 |
| 4.  | Pretrial Order                     | 11/12/2025 |

Dated this 5 day of March, 2025.

  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted this 3rd day of March, 2025.

**HAND & SULLIVAN, LLC**

/s/ George F. Hand  
George F. Hand, Esq.  
Nevada Bar No. 8483  
Samantha A. Herbeck, Esq.  
Nevada Bar No. 14542  
3442 N. Buffalo Drive  
Las Vegas, Nevada 89129  
Attorneys for Plaintiff

**Juliana Cerriteno**

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**From:** Richard Waltjen <rwaltjen@pyattsilvestri.com>  
**Sent:** Friday, February 28, 2025 7:40 AM  
**To:** Juliana Cerriteno  
**Cc:** George Hand; Samantha Herbeck; Michelle Mockbee  
**Subject:** RE: State Farm v Spacom - 2:24-cv-01543 - H&S File No.: 5221.080

Good morning,

I reviewed the Second SAO to Extend Discovery Deadlines. You have my authorization to use my esignature.

Thanks

*Richard Waltjen*  
*Associate Attorney*



**7670 Lake Mead Boulevard, Suite 250**  
**Las Vegas, Nevada 89128**  
**Telephone: (702) 383-6000**  
**Facsimile: (702) 477-0088**  
**[rwaltjen@pyattsilvestri.com](mailto:rwaltjen@pyattsilvestri.com)**  
**[www.pyattsilvestri.com](http://www.pyattsilvestri.com)**

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**From:** Juliana Cerriteno <Julianac@handsullivan.com>  
**Sent:** Thursday, February 27, 2025 4:31 PM  
**To:** Richard Waltjen <rwaltjen@pyattsilvestri.com>  
**Cc:** George Hand <ghand@handsullivan.com>; Samantha Herbeck <sherbeck@handsullivan.com>; Michelle Mockbee <mmockbee@pyattsilvestri.com>  
**Subject:** State Farm v Spacom - 2:24-cv-01543 - H&S File No.: 5221.080

Good Afternoon Mr. Waltjen,

Attached please find draft of SAO to Extend Discovery Deadlines for your review. If you have any requested revisions please use redlines, if none please confirm we have authority to affix your e-signature to the SAO for submission to the court. Thank you.

Sincerely,  
Juliana Cerriteno, Paralegal  
Hand & Sullivan, LLC  
**[Julianac@handsullivan.com](mailto:Julianac@handsullivan.com)**